

Case No. 20-cv-04570-HSG

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Holders of Trade Claims*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

In re:

PG&E CORPORATION

-and-

PACIFIC GAS AND ELECTRIC
COMPANY,

Debtors.

AD HOC COMMITTEE OF
HOLDERS OF TRADE CLAIMS,

Appellant,

v.

PG&E CORPORATION, et al.,

Appellees.

**NOTICE OF COMPLETION OF
BRIEFING AND REQUEST FOR
ORAL ARGUMENT**

On appeal from the United States
Bankruptcy Court for the Northern
District of California, Chapter 11 Case
No. 19-bk-30088-DM (Lead Case)
(Jointly Administered)

PLEASE TAKE NOTICE that briefing on the above-captioned appeal (the “Appeal”) has been completed. The Ad Hoc Committee of Holders of Trade Claims (the “Trade Committee”) hereby advises the Court that the following documents are relevant to the Appeal:

1. *Opening Brief of Ad Hoc Committee of Holders of Trade Claims* [Docket No. 15] (the “Appellant Opening Brief”);
2. *Notice of Joinder and Joinder of Marble Ridge Capital in Opening Brief of Ad Hoc Committee of Holders of Trade Claims* [Docket No. 19];
3. *Notice of Joinder and Joinder of Marble Ridge Capital in Appendix to Opening Brief of Ad Hoc Committee of Holders of Trade Claims* [Docket No. 20];
4. *Principal Brief of Appellees* [Docket No. 21] (the “Appellee Principal Brief”);
5. *Submission Pursuant to Fed. R. Bankr. P. 8014(f)* [Docket No. 22];
6. *Reply Brief of Ad Hoc Committee of Holders of Trade Claims* [Docket No. 23]; and
7. *Notice of Joinder and Joinder of Marble Ridge Capital in Reply Brief of Ad Hoc Committee of Holders of Trade Claims* [Docket No. 24].

Both the Appellant Opening Brief and the Appellee Principal Brief request oral argument with respect to the merits of the issues on appeal. For the convenience of the Court and the other parties to the Appeal, the Trade Committee has consulted with counsel for the appellees, PG&E Corporation and Pacific Gas and Electric Company, and Marble Ridge Capital, and has confirmed the following dates as being available for the parties to this Appeal:

- January 25, 2021 to January 27, 2021
- January 29, 2021 to February 11, 2021
- February 15, 2021 to February 17, 2021
- February 23, 2021 to March 8, 2021
- March 11, 2021 to March 17, 2021

1 The Trade Committee respectfully requests that the Court, subject to its calendar and
2 availability, schedule argument on the merits of this Appeal on a date or dates within
3 the timeframe set forth above.

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5 Dated: November 25, 2020

GIBSON, DUNN & CRUTCHER LLP

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7 By: /s/ Michael S. Neumeister
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CERTIFICATE OF SERVICE

I, Michael S. Neumeister, declare:

1. I am over the age of 18 years and not a party to this action. My business address is Gibson, Dunn & Crutcher LLP, 333 South Grand Avenue, Los Angeles, CA 90071, which is located in the country where the service described below occurred.

2. I hereby certify that on November 25, 2020, I electronically filed the *Notice of Completion of Briefing and Request for Oral Argument* with the Clerk of the Court of the United States District Court, Northern District of California by using the CM/ECF system, which will send notification of such filing to e-mail addresses on file with the Court's CM/ECF system.

3. I certify that service will also be accomplished by e-mail upon counsel listed on **Exhibit A**.

I certify and declare under penalty of perjury that the foregoing is true and correct.

/s/ Michael S. Neumeister
Michael S. Neumeister

EXHIBIT A

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